

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	Criminal No. 1:00-CR-00339
v.	:	
	:	Judge Yvette Kane
ANUPAM DASS	:	
	:	(Electronically Filed)

**MOTION TO EXTEND VOLUNTARY SURRENDER DATE**

AND NOW comes the defendant, Anupam Dass, through his attorney Thomas A. Thornton of the Federal Public Defender's Office, and files this Motion to Extend Voluntary Surrender Date, and in support thereof the following is averred:

1. On February 9, 2005, Anupam Dass appeared for a supervised release revocation hearing before this Honorable Court.
2. At that time Mr. Dass' supervised release was revoked.
3. Mr. Dass was sentenced to 10 months imprisonment and ordered to voluntarily surrender himself for service of his sentence on Wednesday, February 16, 2005.
4. On February 14 and 15, 2005, defense counsel was advised by the United

States Marshal that the Bureau of Prisons had not yet designated Mr. Dass to a facility to serve his sentence.

5. Because Mr. Dass has not yet been designated, it is respectfully requested that his voluntary surrender date be extended for one week to February 23, 2005.

6. Assistant United States Attorney Martin C. Carlson concurs in this Motion to Extend Voluntary Surrender Date.

WHEREFORE, it is respectfully requested that the within Motion to Extend Voluntary Surrender Date

Respectfully submitted,

Date: February 15, 2005

/s/ Thomas A. Thornton  
THOMAS A. THORNTON, ESQUIRE  
Asst. Federal Public Defender  
Attorney ID #PA44208  
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Harrisburg, PA 17101  
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*Attorney for Anupam Dass*

**CERTIFICATE OF SERVICE**

I, Thomas A. Thornton of the Federal Public Defender's Office, do hereby certify that on this date I served a copy of the **MOTION TO CONTINUE SUPERVISED RELEASE VIOLATION HEARING**, via Electronic Case Filing, or by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

Martin C. Carlson, Esquire  
United States Attorney's Office  
Federal Building, Room 217  
228 Walnut Street  
Harrisburg, PA 17108

Anupam Dass  
902 Valley Street  
Enola, PA 17025

Date: February 15, 2005

/s/ Thomas A. Thornton  
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*Attorney for Anupam Dass*